

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE: Troy L. Johns</b>	)	<b>Chapter 13</b>
<b>Chantilly L. Johns</b>	)	<b>Case No. 1:19-bk-02607</b>
<b>Debtors</b>	)	
	)	
<b>Freedom Mortgage Corporation,</b>	)	
<b>Movant</b>	)	
	)	
<b>Troy L. Johns</b>	)	
<b>Chantilly L. Johns</b>	)	
<b>Respondents</b>	)	
<b>Jack N. Zaharopoulos, Trustee</b>	)	

**DEBTORS' RESPONSE TO FREEDOM MORTGAGE CORPORATION'S MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO  
BANKRUPTCY PROCEDURE RULE 4001**

1. Movant, Freedom Mortgage Corporation, filed its Motion for Relief from Stay on December 9, 2021.
2. Debtors acknowledges some Chapter 13 Plan payments are past due.
3. Debtors desire the opportunity to cure any past due payments and continue their Chapter 13 Plan.
4. Debtors assert that Freedom Mortgage Corporation was made aware, by and through email communication with their counsel, Mario Hanyon, Esquire, on December 1, 2021 of the Debtors' intention to cure the delinquency through amendment.
5. Debtors assert that, by and through their counsel, Mark A. Buterbaugh, Esquire, they filed a 5<sup>th</sup> Amended Chapter 13 Plan and Motion to Modify with this court on December 1, 2021 with a deadline to file an objection to the plan of December 22, 2021.
6. Debtors assert that the proposed Chapter 13 Plan proposes to pay an additional \$6,252.59 in post-petition arrears to Movant.

7. Debtors further assert their confirmed Chapter 13 Plan includes a conduit payment to Freedom Mortgage Corporation and the proposed 5<sup>th</sup> Amended Chapter 13 Plan proposes to continue said conduit payment.
8. Debtors further assert that Jack N. Zaharopoulos, Standing Chapter 13 Trustee reports a “Balance on Hand” of \$3,594.73 as of December 10, 2021.
9. Debtors assert that the proposed 5<sup>th</sup> Amended Chapter 13 Plan, combined with the “Balance on Hand” held by the Standing Chapter 13 Trustee, and ongoing conduit payments are sufficient to make Freedom Mortgage Corporation whole.
10. Debtors request the Court deny Movant’s Motion for Relief.

WHEREFORE, Debtors, Troy L. Johns and Chantilly L. Johns, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed December 9, 2021 by Freedom Mortgage Corporation.

Dated: December 10, 2021

Respectfully Submitted,

**/s/ Nicholas G. Platt**  
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